Atty. Docket No. JP919990027US1
(590.049)

REMARKS

Applicant and the undersigned are most grateful for the time and effort accorded the instant application by the Examiner. On October 4, 2005, Applicant's counsel conducted a telephone interview with the Examiner in which the present application, and the Nakayama et al. reference were discussed. No agreement, however, was reached with respect to the claims of the present application.

Claims 1-8, 10-15, and 17-18 were pending in the instant application at the time of the outstanding Office Action. Claims 1, 8, 15, 17, and 18 are independent claims; the remaining claims are dependent claims. Claims 1-5, 8, 13, and 15 stand rejected under 35 U.S.C. §102(b) as anticipated by Nakayama et al., U.S. Patent 5,872,924 (Nakayama). Claims 6 and 14 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Nakayama in view of Itakura, U.S. Patent 6,639,608. Claims 7, 10-11, 12, 17, and 18 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Nakayama in view of Simonoff, U.S. Patent 6,463,460. In addition to being rejected, Claim 18 has been objected to for a minor informality, which has been correct herein. Reconsideration and withdrawal of these rejections is respectfully requested.

The present independent claims have been amended to clearly claim additional novel aspects of an owner identifier, a user management table, and an object management table as used in the present invention. The changes made to independent Claim 1 are illustrative of these amendments. Claim 1 has been amended to recite, *inter alia*, "[a] collaboration work controller having a user management table for registering a node

- 10 -

identification code given for each of the user systems and an owner identifier, which

indicates the creator of objects, related to the node identification code, wherein said user

management table comprises node identification codes, user names, owner identifiers,

and security levels, and an object management table for registering object information

related to the node identification code, wherein said object management table comprises

node identification codes, object data, and graying-out flags . . .". (Claim 1) As

discussed below the amended claims are patentably distinct over the applied art and

should, therefore, be immediately allowed. The Applicant intends no change in the scope

of the claims by the changes made by this amendment. It should be noted these

amendments are not in acquiescence of the Office's position on allowability of the

claims, but merely made to expedite prosecution.

As an overview, Nakayama et al. appears to be directed toward a collaborative

work support system that allows various objects to be displayed and shared among a

group of computer users during collaborative efforts. The present invention, in contrast,

focuses upon, *inter alia*: "[i]dentifying the owner of an object that is currently being

drawn on a collaboration work area, or an object that has already been drawn on the

collaboration work area..."; "[s]electively identifying objects drawn by a certain owner

among objects on the collaboration work area..."; and "facilitating an editing operation of

objects for each owner." (Page 4, line 15 - Page 5, line 2) The operation of these

different inventions results in the preclusion of anticipation by Nakayama. The following

is a discussion focusing upon two of the major differences between Nakayama and the

presently claimed invention. The first difference to be discussed is the presently claimed

invention's displaying of an owner identifier which indicates the creator of objects and the second is the unique way in which data tables are used in the present invention.

The owner identifier of the present invention is not taught or suggested by Nakayama's use of an attribute indicator as shown in Figure 6 and discussed in Column 7, lines 27-42. Nakayama's Figure 6 appears to show several computer screens sharing collaborative work wherein an "ownership" indicator is displayed. As stated above the present amended claims provide an owner identifier, which indicates the creator of objects. Examiner has expressed that owner identifier is met by Nakayama's explanation of Figure 6; however, the Applicant respectfully disagrees. Nakayama specifically defines both "owner" and "author" differently. Nakayama states, "The terms "author" and "owner" hereinafter used have the following meanings. The author means the participant who executes a generation process (...) of the object and the owner means the participant who has the right to operate the object, that is, who is permitted to move, delete, modify or otherwise operate the object." (Col. 5, lines 51-57) Simply stated, in Nakayama an author creates an object while an "owner" controls an object. With this definition in mind, what is then explained and shown in Figure 6 is the displaying of an "owner" identifier that represents the user or users capable of sharing the operation of an object. What is not taught or disclosed in Nakayama is the displaying of an "author" identifier that is a representation of a user who actually generated the object.

As set forth in Nakayama, an object can have three attributes, namely, "share, open-private and non-open private." (Col. 6, lines 18-19). The Nakayama invention appears to allow an indicator of an object's attribute to be displayed. For example, an

- 12 -

indication of share, open-private or non-open private can be displayed for each object as appears to be shown in Figure 6. When the attribute is share then "share" is written in a display about the object. However, when the attribute is private, meaning only a particular user can operate the object, then that user's name is displayed. So although an user's name appears to be displayed in Nakayama it is really just an indication of the user or users who can share/control a particular object. When the display happens to be related to a single user then that user's name is displayed. Thus, no process or method is provided for in Nakayama for the indication of a user who created an object. If such a name is displayed in Nakayama it would merely result as a coincidence, i.e., where the "author" and "owner" were one and the same. Such a coincidence does not anticipate another's invention. In the presently claimed invention the user being identified by an owner identifier is the user who created an object and not, as in Nakayama, the user or users controlling an object. This is specifically indicated in the amended claims. Therefore, the failure of Nakayama to met the present invention's owner identifier means anticipation of the claims having this element are improper. Furthermore, it should be noted that all obviousness rejections based on a combination with Nakayama are also improper, unless they teach all of the elements missing in Nakayama. It is respectfully submitted that here they do not.

The second major distinction to be addressed is the novel use of data tables in the presently claimed invention, which is, also, not met by Nakayama. As indicated before, the amended independent claims provide for the use of a user management table and an object management table. As further indicated in the claims a user management table is

- 13 -

comprised of node identification codes, user names, owner identifiers, and security levels; while, an object management table is comprised of object data, node identification codes, and graying-out flags. The invention's use of a management table and an object management table in this instance is novel and, importantly, not disclosed by the teachings of the prior art, especially that of Nakayama. Figure 7, explained in column 7, lines 46-64 of Nakayama has been cited as teaching a node identification code, user management table, and object management table. The Applicant respectfully disagrees.

In one embodiment of the present invention, reference is had to user and object management tables by a user management unit and an object management unit, respectively; thereby, enabling owners and objects to be related via node identification codes located at both tables. Figure 3 of the Applicant's specification clearly shows that the manner in which various data is located and accessed is not an arbitrary decision, but rather a purposeful decision and also one significant indication of the invention's usefulness. Thus, the way in which data is handled by the present invention is a genuine distinction from that of the applied art. In stark contrast, Nakayama appears to teach "[a] format of object management data used to display the object. The object management data 142 shown in Fig. 7 is generated one for each object prepared by the participant and stored in a work area of the internal memory of the computer 100." (Col. 7, lines 46-50) Nakayama's object management data teaching does not disclosure or suggest the organization and use of data tables as used in the present invention. As best understood, Nakayama discloses a group of data stored at a single location. At Column 11, line 58 through Column 12, line 43 Nakayama appears to teach some data tables that might be

reflected in the sub-groupings found in Figure 7. Whether this is a correct interpretation

or not, it is clear that Nakayama's tabular teachings do not provide the same grouping of

data as currently claimed. The differences between the inventions may also be evidenced

by a comparison of the flow diagrams related to each invention. For the present purposes

of these remarks, however, the point to be made is simply that Nakayama fails to teach

the same type of data tables as claimed herein. Therefore, at least two significant

differences regarding elements of the present claims have been shown, clearly supporting

the withdrawal of the anticipation rejections as well as the obviousness rejections

currently applied.

As the Examiner is well aware, "[a] claim is anticipated only if each and every

element as set forth in the claim is found, either expressly or inherently described in a

single prior art reference." *E.g., Verdegaal Bros. v. Union Oil of California,* 814 F.2d

628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). In addition, a rejection under 35

U.S.C. §103 requires: all the elements of the claimed invention must be specifically

taught or suggested in the referenced art to a person skilled in the art; a motivation must

be shown in the referenced art or to a person skilled in the art for the combination or

modification of the art; and an expectation of success must have been present at the time

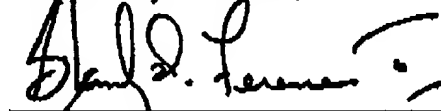the combination or modification would have been made.

It is respectfully submitted that Nakayama has clearly failed to teach all of the

claims for which it is said to anticipate. Furthermore, Simonoff and Itakura fail to

overcome the deficiencies of Nakayama. The Applicant, therefore, traverses these

rejections. The combination of these references does not teach or suggest to one skilled

Atty. Docket No. JP919990027US1
(590.049)

in the art all of the limitations of the presently claimed invention. (It should be noted that a substantial discussion of the differences between the present invention and Simonoff was provided in the Applicant's Amendment dated May 5, 2005, which is hereby incorporated by reference as if fully set forth herein). For all of the aforementioned reasons the withdrawal of all the rejections relying upon Nakayama is necessary and proper. By virtue of dependence from what are believed to be allowable independent Claims 1, 8, 15, 17 and 18, it is respectfully submitted that Claims 2-7 and 10-14 are also presently allowable.

In summary, it is respectfully submitted that the instant application, including Claims 1-8, 10-15, 17, and 18, is presently in condition for allowance. Notice to the effect is earnestly solicited. If there are any further issues in this application, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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- 16 -